

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re:

Bky No. 09-50779

Dennis E. Hecker,

Chapter 7

Debtor.

Randall L. Seaver, Trustee,

Adv. No. 09-5045

Plaintiff,

vs.

**JOINT STATEMENT UNDER
LOCAL RULE 7037-1**

Dennis E. Hecker, Midwest Motors, LLC,
LKMCD Properties, LLC, Chrysler Financial Services
Americas LLC, Toyota Motor Credit Corporation,
Toyota Financial Savings Bank,
Inver Grove Motors LLC d/b/a Denny Hecker's
Inver Grove Toyota, Jacob Holdings of Highway 110 LLC,
And Jacob Holdings of Akron Avenue LLC,

Defendants.

After numerous telephone and e-mail communications, counsel for Steven McDaniels and counsel for Dennis Hecker are unable to resolve their disagreement concerning the timing of Mr. McDaniels's deposition and whether it should occur prior to this Court's approval or rejection of a settlement agreement. Counsel for Mr. McDaniels requests this Court enter a protective order staying Mr. McDaniels's deposition pending its decision regarding a settlement agreement that will be dispositive of this adversary proceeding. Counsel for Mr. Hecker wants to depose Mr. McDaniels on May 27, 2010.

Dated: May 24, 2010

MACKALL, CROUNSE & MOORE, PLC

By /e/ Andrew P. Moratzka
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Dated: May 24, 2010

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